

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 2446

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On September 6, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Second Motion of Debtors for Entry of an Order Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof* [D.I. 2446] (the “Motion”).

2. As of the date hereof, no formal objections or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the proposed form of order filed with the Motion from the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (the “Committee”) and the Ad Hoc Committee of Non-US Customers of FTX.com (the “Ad Hoc Committee”).

3. To resolve the Informal Comments, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee (the “U.S. Trustee”), the Committee and the Ad Hoc Committee. The U.S. Trustee, the Committee and the Ad Hoc Committee have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

4. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: September 22, 2023  
Wilmington, Delaware

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